

RETURN DATE: FEBRUARY 7, 2012

STATE OF CONNECTICUT
EX REL. GEORGE JEPSEN,
ATTORNEY GENERAL

:

SUPERIOR COURT

v.

:
:
:
:
:

JUDICIAL DISTRICT OF HARTFORD
AT HARTFORD

JAMES J. SANTORELLA

JANUARY 10, 2012

COMPLAINT

1. This is an action under Conn. Gen. Stat. §1-110 et seq. seeking the revocation or reduction of the pension of a state or municipal employee who has been convicted of a crime related to state or municipal office. In particular, the complaint seeks the revocation or reduction of the pension of Defendant JAMES J. SANTORELLA who was employed by the City of Stamford, Connecticut from June 10, 1974 through May 21, 2010, for the reasons pleaded below.

I. THE PARTIES

2. The plaintiff is the STATE OF CONNECTICUT, acting on the relation of GEORGE JEPSEN, ATTORNEY GENERAL OF THE STATE OF CONNECTICUT. The Attorney General is expressly authorized by virtue of Conn. Gen. Stat. §1-110a(a) to bring actions such as this with respect to public officials and/or state or municipal employees who are convicted of or plead guilty or nolo contendere to any crime related to state or municipal office.

3. Defendant JAMES J. SANTORELLA is a natural person residing in Norwalk, Connecticut.

EN
51

**II. CAUSE OF ACTION —
REVOCATION OR REDUCTION OF PENSION**

4. During the period of time from June 10, 1974 through May 21, 2010 Defendant JAMES J. SANTORELLA was employed by the City of Stamford, Connecticut.

5. Defendant's employment by the City of Stamford, Connecticut constitutes service as a "state or municipal employee" within the meaning of Conn. Gen. Stat. §1-110(2).

6. Defendant JAMES J. SANTORELLA is entitled to pension benefits by virtue of his employment by the City of Stamford, Connecticut.

7. Defendant JAMES J. SANTORELLA was convicted of the following crime: one count of Larceny in the First Degree. Defendant was sentenced on September 10, 2010. This conviction is reflected in the following case on file in the Superior Court for the Judicial District of Stamford: *State of Connecticut v. James J. Santorella*, #FST-CR10-0170577-T.

8. The charge for which Defendant JAMES J. SANTORELLA was convicted constituted a "crime related to state or municipal office" within the meaning of Conn. Gen. Stat. §1-110(3).

9. Defendant JAMES J. SANTORELLA was a public official and/or state or municipal employee who was convicted of a crime related to state or municipal office.

51

DEMAND FOR RELIEF

WHEREFORE, pursuant to Conn. Gen. Stat. §§1-110a, the STATE OF CONNECTICUT, acting on the relation of GEORGE JEPSEN, ATTORNEY GENERAL OF THE STATE OF CONNECTICUT, requests the following relief:

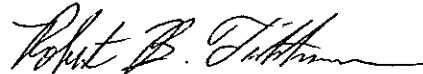
51

1. Revocation and/or reduction of any pension to which Defendant JAMES J. SANTORELLA is entitled on account of his service as a public official and/or state or municipal employee;
2. Such other relief as is just and equitable to effectuate the purposes of this action.

Dated at Hartford, Connecticut, this 10th day of January, 2012.

**PLAINTIFF
STATE OF CONNECTICUT**

BY: GEORGE JEPSEN
ATTORNEY GENERAL



Robert B. Teitelman (Juris # 085053)
Assistant Attorney General
55 Elm Street, P.O. Box 120
Hartford, CT 06141-0120
Tel. (860) 808-5355/ Fax (860)808-5391
e-mail: robert.teitelman@ct.gov